

ORIGINAL

FILED IN CHAMBERS  
U.S.D.C. Atlanta

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DEC 08 2010

JAMES N. HATTEN, Clerk  
By *[Signature]* Deputy Clerk

UNITED STATES OF AMERICA	:	
	:	CRIMINAL INDICTMENT
v.	:	
	:	NO. 1 : 10 - CR - 512
ANTHONY VINCENT CARTMAN,	:	
ERRON DENISE LOVE-MORGAN,	:	
TCHAKA JAMAL SHIELDS, and	:	
CASITA QWANET WASHINGTON	:	

THE GRAND JURY CHARGES THAT:

COUNT ONE

From on or about March 11, 2009, through on or about May 3, 2009, in the Northern District of Georgia, the defendants, ANTHONY VINCENT CARTMAN, ERRON DENISE LOVE-MORGAN, TCHAKA JAMAL SHIELDS, CASITA QWANET WASHINGTON, and others unknown to the grand jury, did combine, conspire, confederate, agree, and have a tacit understanding with each other and others known and unknown to the grand jury, to knowingly cause false representations to be made with respect to information required to be kept in the records of a federal firearms licensee, licensed under Chapter 44 of Title 18, United States Code, an offense against the United States in violation of Title 18, United States Code, Section 924(a)(1)(A).

OBJECT OF THE CONSPIRACY/MANNER AND MEANS

The object of the conspiracy was to purchase firearms in the State of Georgia on behalf of defendant ANTHONY VINCENT CARTMAN, a prohibited person, and defendant TCHAKA JAMAL SHIELDS, a prohibited

person, thereby concealing the true identity of the actual purchaser.

Co-conspirator ERRON DENISE LOVE-MORGAN was recruited by ANTHONY VINCENT CARTMAN and TCHAKA JAMAL SHIELDS to purchase firearms and to state that she was the actual purchaser, when in fact she was not the actual purchaser and intended recipient of the firearms. Co-conspirator ERRON DENISE LOVE-MORGAN was a "straw purchaser", that is, a person who purchases firearms on behalf of another person to conceal the identity of the true purchaser on records required to be kept by law.

Co-conspirator CASITA QWANET WASHINGTON was also recruited by ANTHONY VINCENT CARTMAN and TCHAKA JAMAL SHIELDS to purchase firearms and to state that she was the actual purchaser, when in fact she was not the actual purchaser and intended recipient of the firearms. Co-conspirator CASITA QWANET WASHINGTON was a "straw purchaser", that is, a person who purchases firearms on behalf of another person to conceal the identity of the true purchaser on records required to be kept by law.

ANTHONY VINCENT CARTMAN used a straw purchaser to purchase firearms because at all times relevant to the conspiracy, ANTHONY VINCENT CARTMAN was a convicted felon and thereby prohibited from purchasing firearms. TCHAKA JAMAL SHIELDS used a straw purchaser to purchase firearms because at all times relevant to the conspiracy, TCHAKA JAMAL SHIELDS was a convicted felon and thereby prohibited

from purchasing firearms.

Overt Acts

In furtherance of the conspiracy and in order to accomplish the goals thereof, the defendants, ANTHONY VINCENT CARTMAN, ERRON DENISE LOVE-MORGAN, TCHAKA JAMAL SHIELDS and CASITA QWANET WASHINGTON committed and caused to be committed overt acts, including, but not limited to, at least one of the following:

1. On or about March 11, 2009, ERRON DENISE LOVE-MORGAN and TCHAKA JAMAL SHIELDS went to TGS Services, Inc., d/b/a The Gun Store, located at 5093 Buford Highway, Doraville, Georgia.
2. On or about March 11, 2009, an employee of The Gun Store observed TCHAKA JAMAL SHIELDS pointing out certain firearms and saying "get this one right here" to ERRON DENISE LOVE-MORGAN, who thereafter attempted to purchase those firearms.
3. On or about March 11, 2009, ERRON DENISE LOVE-MORGAN executed an ATF Form 4473 wherein she falsely stated that she was the actual intended buyer of the firearms that TCHAKA JAMAL SHIELDS had pointed out to her.
4. On or about March 12, 2009, CASITA QWANET WASHINGTON and TCHAKA JAMAL SHIELDS went together to TGS Services, Inc. d/b/a The Gun Store, located at 5093 Buford Highway, Doraville, Georgia.

5. On or about March 12, 2009, TCHAKA JAMAL SHIELDS gave cash to CASITA QWANET WASHINGTON in the parking lot of The Gun Store to purchase firearms.
6. On or about March 12, 2009, TCHAKA JAMAL SHIELDS entered the store and pointed out certain firearms to CASITA QWANET WASHINGTON and stated, "get these two right here."
7. On or about March 12, 2009, CASITA QWANET WASHINGTON attempted to purchase the firearms that TCHAKA JAMAL SHIELDS had pointed out to her.
8. On or about March 12, 2009, CASITA QWANET WASHINGTON executed an ATF Form 4473 wherein she falsely stated that she was the actual intended buyer of the firearms.
9. On or about March 14, 2009, CASITA QWANET WASHINGTON attended a gun show at the Lawrenceville Showgrounds, 2405 Sugarloaf Parkway, Lawrenceville, Georgia with ANTHONY VINCENT CARTMAN.
10. On or about March 14, 2009, CASITA QWANET WASHINGTON purchased the following firearms that ANTHONY VINCENT CARTMAN designated for her to buy from Southern Stuff, a federally licensed firearms dealer:
  - one (1) Taurus, model PT145, .45 caliber pistol, bearing serial number NBW87869
  - one (1) Taurus, model PT145, .45 caliber pistol, bearing serial number NBX13796; and,
  - one (1) Taurus, model PT917c, 9mm pistol, bearing serial number TAV18837.
11. On or about March 14, 2009, CASITA QWANET WASHINGTON

executed an ATF Form 4473 wherein she falsely stated that she was the actual buyer of the aforementioned firearms.

12. On or about March 14, 2009, upon returning to CASITA QWANET WASHINGTON's residence, ANTHONY VINCENT CARTMAN took possession of and left the premises with at least two of the firearms that CASITA QWANET WASHINGTON had purchased.

13. On or about May 2, 2009, one of the firearms that was purchased by CASITA QWANET WASHINGTON on March 14, 2009, that is, the Taurus model PT145 .45 caliber pistol bearing serial number NBW87869, was recovered by law enforcement officers in Boston, Massachusetts, following a shooting incident that resulted in two arrests for assault with a deadly weapon, among other charges.

14. On or about March 21, 2009, ERRON DENISE LOVE-MORGAN attended a gun show at the State Farmer's Market, 16 Forest Parkway, Forest Park, Georgia.

15. On or about March 21, 2009, while at the State Farmer's Market, ERRON DENISE LOVE-MORGAN purchased the following firearms from Main Street Arms, a federally licensed firearms dealer:

- one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM73547;
- one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM72799; and,
- one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM65295.

16. On or about March 21, 2009, when ERRON DENISE LOVE-MORGAN executed the ATF Form 4473 she falsely stated that she was the actual buyer of the aforementioned firearms.
17. On or about September 22, 2009, one of the firearms purchased by ERRON DENISE LOVE-MORGAN on March 21, 2009, the Taurus model PT145 .45 caliber pistol bearing serial number NCM73547, was recovered by law enforcement officers of the Youth Violence Strike Force in Boston, Massachusetts, during a gang-related investigation.
18. On or about April 18, 2009, ERRON DENISE LOVE-MORGAN attended a gun show at the Cobb County Civic Center, 548 South Marietta Parkway, Marietta, Georgia.
19. On or about April 18, 2009, while at the Cobb County gun show, ERRON DENISE LOVE-MORGAN purchased the following firearms from Southern Stuff, a federally licensed firearms dealer:
  - one (1) Taurus, Model 617, .357 caliber revolver, bearing serial number BR61498Z;
  - one (1) Taurus, Model 85, .38 caliber revolver, bearing serial number CN22381; and,
  - one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NCN95847.
20. On or about April 18, 2009, when ERRON DENISE LOVE-MORGAN executed the ATF Form 4473 she falsely stated that she was the actual buyer of the aforementioned firearms.
21. On or about April 26, 2009, ERRON DENISE LOVE-MORGAN

attended a gun show at the North Atlanta Trade Center, 1700 Jeurgens Court, Norcross, Georgia.

22. On or about April 26, 2009, while at the North Atlanta Trade Center, ERRON DENISE LOVE-MORGAN purchased the following firearms from Southern Stuff, a federally licensed firearms dealer:

- one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NBX16731;
- one (1) Taurus, Model PT145, .45 caliber pistol, bearing serial number NCN95873; and,
- one (1) Taurus, Model 24/7, .45 caliber pistol, bearing serial number NAR16631.

24. On or about April 26, 2009, when ERRON DENISE LOVE-MORGAN executed the ATF Form 4473 she falsely stated that she was the actual buyer of the aforementioned firearms.

25. On or about May 3, 2009, ERRON DENISE LOVE-MORGAN attended a gun show at the Atlanta Expo Center, 3650 Jonesboro Road, Atlanta, Georgia.

26. On or about May 3, 2009, while at the Atlanta Expo, ERRON DENISE LOVE-MORGAN purchased the following firearms from Southern Stuff, a federally licensed firearms dealer:

- one (1) Taurus, Model 24/7, .40 caliber pistol, bearing serial number SBR32560;
- one (1) Taurus, Model PT140, .40 caliber pistol, bearing serial number SCO12530;
- one (1) Taurus, Model PT140, .40 caliber pistol, bearing serial number SCN02663;
- one (1) Taurus, Model 24/7, .45 caliber pistol, bearing serial number NAR16627;
- one (1) Taurus, Model 24/7, .45 caliber pistol, bearing serial number NBS62842; and,
- one (1) Taurus, Model PT145, .45 caliber pistol,

bearing serial number NCO18528.

26. On or about May 3, 2009, when ERRON DENISE LOVE-MORGAN executed the ATF Form 4473 she falsely stated that she was the actual buyer of the aforementioned firearms.
27. At all times relevant to this conspiracy, ANTHONY VINCENT CARTMAN and TCHAKA JAMAL SHIELDS were prohibited persons, in that both CARTMAN and SHIELDS had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is a felony offense.
28. Further, the offenses described in Counts Two through Eight of this Indictment are hereby incorporated by reference and alleged as overt acts in furtherance of the conspiracy as if fully set forth herein.

All in violation of Title 18, United States Code, Section 371.

#### COUNT TWO

On or about March 11, 2009, in the Northern District of Georgia, the defendants, ANTHONY VINCENT CARTMAN, TCHAKA JAMAL SHIELDS, and ERRON DENISE LOVE-MORGAN, aided and abetted by each other, did knowingly cause false representations to be made with respect to information required to be kept in the records of a federal firearms licensee, licensed under Chapter 44 of Title 18, United States Code, that is: TGS Services, Inc. d/b/a The Gun Store, located at 5093 Buford Highway, Doraville, Georgia, in that



the said defendants did cause to be falsely represented on a Firearms Transaction Record, ATF Form 4473, that ERRON DENISE LOVE-MORGAN, was the true transferee or buyer of firearms, when in fact, the true transferee, or buyer, of the firearms was not the said ERRON DENISE LOVE-MORGAN, all in violation of Title 18, United States Code, Section 924(a)(1)(A) and Section 2.

COUNT THREE

On or about March 12, 2009, in the Northern District of Georgia, the defendants, ANTHONY VINCENT CARTMAN, TCHAKA JAMAL SHIELDS, and CASITA QWANET WASHINGTON, aided and abetted by each other, did knowingly cause false representations to be made with respect to information required to be kept in the records of a federal firearms licensee, licensed under Chapter 44 of Title 18, United States Code, that is: TGS Services, Inc., d/b/a The Gun Store, located at 5093 Buford Highway, Doraville Georgia, in that the said defendants did cause to be falsely represented on a Firearms Transaction Record, ATF Form 4473, that CASITA QWANET WASHINGTON, was the true transferee or buyer of firearms, when in fact, the true transferee, or buyer, of the firearms was not the said CASITA QWANET WASHINGTON, all in violation of Title 18, United States Code, Section 924(a)(1)(A) and Section 2.

COUNT FOUR

On or about March 14, 2009, in the Northern District of Georgia, the defendants, ANTHONY VINCENT CARTMAN, TCHAKA JAMAL SHIELDS, and CASITA QWANET WASHINGTON, aided and abetted by each other, did knowingly cause false representations to be made with respect to information required to be kept in the records of a federal firearms licensee, licensed under Chapter 44 of Title 18, United States Code, that is: Southern Stuff, located at 8613 Highway 52 West, Dahlonega, Georgia, in that the said defendants did cause to be falsely represented on a Firearms Transaction Record, ATF Form 4473, that CASITA QWANET WASHINGTON, was the true transferee or buyer of the stated firearms, listed below, when in fact, the true transferee, or buyer, of the firearms was not the said CASITA QWANET WASHINGTON:

<u>COUNT</u>	<u>DATE</u>	<u>FIREARMS</u>	<u>LICENSEE</u>
FOUR	03-14-09	<ul style="list-style-type: none"> <li>•Taurus, model PT145, .45 caliber pistol, with serial number NBW87869</li> <li>•Taurus, model PT145, .45 caliber pistol, with serial number NBX13796</li> <li>•Taurus, model PT917c, 9mm pistol, serial number TAV18837</li> </ul>	Southern Stuff, 8613 Highway 52 West, Dahlonega, Georgia

All in violation of Title 18, United States Code, Section 924(a)(1)(A) and Section 2.

COUNTS FIVE THROUGH EIGHT

On or about the dates listed below in the Northern District of Georgia, the defendants, ANTHONY VINCENT CARTMAN, and ERRON DENISE LOVE-MORGAN, aided and abetted by each other, did knowingly cause false representations to be made with respect to information required to be kept in the records of a federal firearms licensee, listed below, licensed under Chapter 44 of Title 18, United States Code, in that defendant, ERRON DENISE LOVE-MORGAN, did cause to be falsely represented on Firearms Transaction Records, ATF Forms 4473, that ERRON DENISE LOVE-MORGAN was the true transferee, or buyer, of the stated firearms, listed below, when in fact, the true transferee, or buyer, of the firearms was not the said ERRON DENISE LOVE-MORGAN:

<u>COUNT</u>	<u>DATE</u>	<u>FIREARMS</u>	<u>LICENSEE</u>
FIVE	03-21-09	<ul style="list-style-type: none"> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCM73547</li> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCM72799</li> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCM65295</li> </ul>	Main Street Arms, Inc., 75 Arcado Rd B-2, Lilburn, Georgia

SIX	04-18-09	<ul style="list-style-type: none"> <li>•Taurus, Model 617, .357 caliber revolver, serial number BR61498Z</li> <li>•Taurus, Model 85, .38 caliber revolver, serial number CN22381</li> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCN95847</li> </ul>	Southern Stuff, 8613 Highway 52 West, Dahlonga, Georgia
SEVEN	04-26-09	<ul style="list-style-type: none"> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NBX16731</li> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCN95873</li> <li>•Taurus, Model 24/7, .45 caliber pistol, serial number NAR16631</li> </ul>	Southern Stuff, 8613 Highway 52 West, Dahlonga, Georgia

EIGHT	05-03-09	<ul style="list-style-type: none"> <li>•Taurus, Model 24/7, .40 caliber pistol, serial number SBR32560</li> <li>•Taurus, Model PT140, .40 caliber pistol, serial number SCO12530</li> <li>•Taurus, Model PT140, .40 caliber pistol, serial number SCN02663</li> <li>•Taurus, Model 24/7, .45 caliber pistol, serial number NAR16627</li> <li>•Taurus, Model 24/7, .45 caliber pistol, serial number NBS62842</li> <li>•Taurus, Model PT145, .45 caliber pistol, serial number NCO18528.</li> </ul>	Southern Stuff, 8613 Highway 52 West, Dahlonega, Georgia
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All in violation of Title 18, United States Code, Section 924(a)(1)(A) and Section 2.

FORFEITURE PROVISION

Upon conviction of any offense alleged in this Indictment, the defendants, ANTHONY VINCENT CARTMAN, ERRON DENISE LOVE-MORGAN, TCHAKA JAMAL SHIELDS, and CASITA QWANET WASHINGTON shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461, all firearms and ammunition involved in the commission of the offenses, including but not limited to the firearms described below:

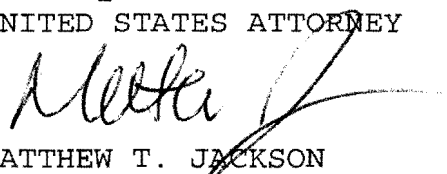
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NBW87869;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NBX13796;
- Taurus, Model PT917c, 9mm pistol, bearing serial number TAV18837;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM73547;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM72799;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCM65295;
- Taurus, Model 617, .357 caliber revolver, bearing serial number BR61498Z;
- Taurus, Model 85, .38 caliber revolver, bearing serial number CN22381;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCN95847;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NBX16731;
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCN95873;
- Taurus, Model 24/7, .45 caliber pistol, bearing serial number NAR16631;
- Taurus, Model 24/7, .40 caliber pistol, bearing serial number SBR32560;
- Taurus, Model PT140, .40 caliber pistol, bearing serial number SCO12530;
- Taurus, Model PT140, .40 caliber pistol, bearing serial number SCN02663;
- Taurus, Model 24/7, .45 caliber pistol, bearing serial number NAR16627;

- Taurus, Model 24/7, .45 caliber pistol, bearing serial number NBS62842; and,
- Taurus, Model PT145, .45 caliber pistol, bearing serial number NCO18528.

A True BILL

  
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FOREPERSON

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